

Department of Energy
Office of Nuclear and Facility Safety Policy
Nuclear Safety Technical Position
NSTP 2002-1

Transportation Packaging for Onsite Transfers

Issue:

There is a need for clarification in 10 CFR 830 Subpart B for the transportation activities safe harbors. The safe harbors for the Documented Safety Analysis (DSA) for transportation activities are specified in 10 CFR 830 Subpart B, Table 2 to Appendix A. These safe harbors include both a Transportation Safety Document (TSD) and a Safety Analysis Report for Packaging (SARP). How should packaging approvals be handled as part of a transportation DSA?

Background:

Safe harbors 9 and 10 of Table 2 for transportation activities specify the preparation of a SARP and a TSD in accordance with the applicable Order (O 460.1A or O 461.1) and its guidance document (DOE G 460.1-1 or DOE M 461-1). The guidance documents state that onsite transfers may make use of Certified packaging, packaging equivalent to Certified packaging, or non-equivalent packaging. For packaging to be certified, the Department of Energy (DOE) or the Nuclear Regulatory Commission (NRC) review and approve SARPs.

Technical Position:

Transfers using Certified packaging make use of the SARP that has been reviewed and approved by DOE or NRC. Submission and additional review and approval of these SARPs as part of the DSA are not required.

Guidance for the treatment of equivalent and non-equivalent packaging in a TSD in DOE G 460.1-1 or DOE M 461-1, as applicable, should be followed. In the case of equivalent packaging, this includes a demonstration of equivalency in the TSD. In the case of non-equivalent packaging, an acceptable safety basis is based on an integrated approach, which considers the packaging in combination with specified communication and control measures. This includes establishing the performance envelope of the packaging in the TSD and may involve confirmatory testing. In either case, a demonstration of a technically defensible safety basis is necessary. Satisfying these requirements is deemed to constitute the SARP, for equivalent and non-equivalent packaging, as part of a TSD.

In addition to documenting the safety of Department of Transportation (DOT) equivalent and non-equivalent packaging, a TSD must be developed for onsite transportation. This TSD must include the other transportation control and communication requirements that will be implemented. If full DOT compliance is met for both the packaging and the other transportation safety and communication requirements, then a contractor only needs to submit documentation of full DOT compliance to DOE. If the other safety control and communication requirements do not meet all DOT requirements, then these requirements must be defined and justified in the TSD.

Approved:

Beverly A. Cook

Disapproved: _____

Date:

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